



# Supplier Code of Conduct

January 2024



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## Purpose of the Code

Liontown Resources Limited and its subsidiaries (**Liontown**) is committed to environmentally and socially responsible procurement and we expect the same high standards of our suppliers. At Liontown, we believe that the success of our business is deeply intertwined with the well-being of our planet and society.

This policy outlines the minimum standards and expectations that we have for our suppliers including their own supply chain. In addition, we require our suppliers to embrace and comply with our policies and procedures. Our policies and procedures can be found on our website ([Link](#)).

## Our Values

By partnering with suppliers who prioritise responsible business practices, we can create a more responsible, sustainable and resilient supply chain. Working together, we can minimise risks, drive innovation, and contribute to a better future for our stakeholders and the world at large.

Our values form the foundation of our culture and guide us in achieving our vision and delivering on our strategy.

### **Safety**

*Do no harm. In all our activities we must send everyone home safe, every day. This relates to our employees, contractors, suppliers and to the communities in which we operate.*

### **Sustainability**

*Sustainability is core in all our operations. With our customers and suppliers, we work towards a circular economy in which we develop resources responsibly and the raw materials we produce are used efficiently and responsibly.*

### **Sense of Team**

*We are a group of people who get together to do important work. We are inclusive. We celebrate our diversity. We have fun.*

### **Respect**

*Our work involves many relationships and many stakeholders with diverse objectives. We ensure all voices are respectfully heard and work toward solutions that balance the interests of all stakeholders.*

### **Ambition**

*We don't just want to do well; we want to do better. We plan well and act on these plans, and then study them to identify how we can improve for next time. The challenge of constant improvement is what motivates us. We set objectives and then discover how these can be achieved.*

### **Integrity**

*We have many stakeholders who expect great things from us. We must deliver on our commitments while meeting their high standards of conduct. We have the courage to do the right thing, even when it is the harder thing. We don't take 'shortcuts'.*

## Environment

We prioritise our partners and suppliers based on their ability to demonstrate strong environmental credentials. We work with suppliers who share our values of responsible business practices, and we prioritise collaboration with



suppliers who also prioritise environmental sustainability in their operations. We work with suppliers who share our commitment and can demonstrate this by:

- A formal commitment to environmental responsibility.
- Promoting a culture that values the environment and acts to protect the environment in which they operate.
- Seek ways to minimise any adverse environmental impact across their operations and supply chain, including in relation to biodiversity, waste, water, energy and emissions.

When partnering with us you are dedicated to sharing our commitment to sustainability so that, together, we can make a positive impact on the world around us.

## Health and Safety

We will do everything we can to create a safe work environment. We will ensure everyone who visits our workplaces is supported and goes home safe, everyday. Our suppliers will share this commitment by:

- Providing a safe and healthy working environment for employees and subcontractors including provision of appropriate personal protective equipment.
- Taking all practical and reasonable measures to eliminate workplace fatalities, injuries and disease.
- Provide training to ensure people have the skills required to work safely.
- Comply with applicable health and safety laws, regulations and contract requirements.

## Labour and Human Rights

Liontown is committed to ensuring that human rights – the rights and liberties we are all entitled to as human beings – are recognised and protected within our operations, business relationships and throughout our supply chain.

Our suppliers must respect and uphold the same level of the safeguarding of human rights and dignity of all workers and stakeholders involved in their business activities, just as we do at Liontown.

Our suppliers must provide fair and equal opportunities, wages, and benefits to their workers, and prohibit any discrimination, harassment, abuse, or violence based on race, colour, gender, age, religion, national origin, disability, sexual orientation, political beliefs or any other protected characteristic.

Our suppliers must provide a workplace that is safe from physical and mental harm, by ensuring a harmless, healthy, and productive work environment. Our suppliers must comply with Australia's *Modern Slavery Act (2018)* Cth.

We expect our suppliers to respect human rights by:

- Working to implement core international business and human rights expectations and standards, including the United Nation's Guiding Principles on Business and Human Rights.
- Not using forced or compulsory labour or any other form of modern slavery.
- Preventing the use of child labour including checking all workers are of local legal age.
- Providing fair remuneration and work conditions for all workers.
- Promoting equitable treatment and preventing harassment and discrimination.
- Providing employees with the right to freedom of association and collective bargaining.
- Respecting the privacy of employees and customers and complying with all laws in the collection, use and protection of personal information.



## Community

We are committed to working with local communities to understand their needs and priorities and we strive to incorporate their input into our operations. We prioritise local employment and training opportunities. We work with suppliers who support social, economic, and institutional development of communities by:

- Supporting community engagement initiatives aimed at employing, procuring, and building capacity within host communities where they operate.
- Respecting cultural heritage sites, customs and traditions to ensure cultural heritage protection.
- Supporting the social and economic development of local communities.

## Transparency, Integrity, and Accountability

At Liontown, we believe that strong corporate governance is essential for maintaining the trust of our stakeholders and ensuring that our business operates in a transparent and sustainable manner.

We are committed to maintaining a culture of accountability, integrity, and transparency and we believe that our corporate governance practices are an important aspect of our long-term success.

We operate in accordance with our Vision and Values, including compliance with all relevant legal and statutory obligations, and we expect the same from our suppliers, we work with suppliers who are committed to:

- Compliance with all applicable laws and regulations.
- Ensure personal activities and interests, and those of employees and subcontractors, do not conflict with their responsibilities to Liontown.
- Not commit, or become involved in, bribery or corruption of any form, including facilitation payments.
- Maintain policies and practices to allow violations, misconduct, or grievances to be reported by workers and addressed without fear of retaliation.
- Fair operating practices.

## Confidentiality, Privacy and Data Protection

Liontown is committed to respecting privacy and the protection of data by ensuring data and information is handled appropriately and lawfully.

We expect our suppliers to:

- Comply with applicable laws, regulations and contract requirements.
- Treat Liontown data as confidential and use only for purposes of the contract.
- Apply adequate data privacy and security to protect Liontown's data from unauthorised access, use and disclosure.
- Notify Liontown immediately should they become aware of a data breach.
- Obtain written approval from Liontown's Corporate Affairs department prior to the publication of any communication regarding Liontown. This includes the use of Liontown's name and/or logo in marketing activities, press releases, social media posts or media interviews.



## Reporting Breaches of the Code

Liontown is committed to creating and maintaining a culture of corporate compliance and ethical behaviour. We encourage suppliers to report concerns or deviations relating to the Code including any illegal, unethical or improper conduct.

Suppliers can raise concerns on a confidential basis, without fear of reprisal, or discriminatory treatment, through Liontown's whistleblower process. See our Whistleblower Protection Policy located on our website ([link](#)).

## Review of the Code

Liontown reserves the right to vary this policy at its discretion. The Code will be periodically reviewed to check that it is operating effectively and whether any changes are required.

Policy Ref.	Policy Name	Version	Author	Approving Authority	Approved Date
P-25 (A)	Supplier Code of Conduct	1	Contracts & Procurement	Chief Commercial Officer	30 January 2024





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